

UNITED STATES OF AMERICA,

PLAINTIFF,

V.

DAVID R. GIBSON,
ROBERT V.A. HARRA,
WILLIAM NORTH, AND
KEVYN RAKOWSKI,

DEFENDANTS.

CRIMINAL ACTION NO. 1:15-23-RGA

JOINT MOTION AND PROPOSED SCHEDULING ORDER

NOW COME the undersigned parties, who have met and conferred regarding the schedule for sentencing, and hereby jointly propose the following:

1. The parties believe that a two-step sentencing process is appropriate: The first hearing, involving all defendants, would address issues common to the sentencing of all defendants. A second, separate hearing for each defendant, to follow the first hearing by at least two weeks, would address each defendant individually.

2. Given the time needed to prepare for sentencing, including the presentence investigation to be conducted by U.S. Probation, and given various scheduling conflicts involving lead counsel, the defendants respectfully request that the Court schedule the first hearing during the week of October 8, 2018. While defendants can be available any day that week, defendants would prefer October 9, 10 or 11, 2018.

3. The government respectfully requests that the first phase of the sentencing proceedings be scheduled for any day during the week of October 8. While the government

remains available at other times, these dates appear to be the only dates that accommodate the competing trial schedules of defendants' counsel. These dates fall between the expected conclusion of a two-three week trial involving Defendant Gibson's counsel, and the four week trial that Defendant Harra's counsel is scheduled to begin on October 15. The government objects to the delay of the first sentencing hearing until after the completion of both of those trials in mid-November, more than six months after the jury returned its verdict.

4. A proposed Order follows at the conclusion of the signature blocks.

Respectfully Submitted,

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By: /s/
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Rakowski*

Dated: May 31, 2018

AND NOW, this 1 day of June, 2018, IT IS ORDERED that the joint motion for a scheduling Order is GRANTED.

The first sentencing hearing is scheduled on October 10, 2018, at 9 a.m. in United States District Court for the District of Delaware, Courtroom 6A, J. Caleb Boggs Federal Building, Wilmington, Delaware.

By the Court: Richard G. Andrews
Hon. Richard G. Andrews
United States District Judge